The Commonwealth of Massachusetts

Office of

Campaign & Political Finance

One Ashburton Place, Boston 02108

727-8352

AO-82-24

Dennis J. Duffin
Director

November 12, 1982

James J. Derba, Treasurer
The Committee to Re-elect Ed King Governor, Inc.
25 Nashua Street
Boston, MA 02114

Dear Mr. Derba:

Thank you for your recent letter, which arrived in our office November 5, 1982, regarding the use of political campaign funds to pay for parking tickets.

M.G.L. c. 55, Section 6:

"A political committee organized or operating on behalf of a candidate for the office of governor, lieutenant governor, attorney general, state secretary, treasurer and receiver general, or auditor may receive pay and expend money or other things of value for reasonable and necessary expenses directly related to the campaign of the candidate but shall not make any expenditure that is primarily for the candidate's or any other person's personal use, provided however, that the director shall establish reasonable rules and regulations concerning such expenditures."

Violations of the law are not permissible campaign expenditures, regardless of the fact that campaign activity was being conducted during the course of such violation. Rather, legal violations are personal in nature, and clearly attributable to the person who has engaged in the violation. Thus, such expenditures are not permissible, in accordance with the above section.

In addition, Section 3, states "The director shall have the power and authority to investigate the legality, validity, completeness and accuracy of all reports and actions required to be filed and taken by candidates, treasurers, political committees, and any other person pursuant to this chapter and any other laws of the commonwealth pertaining to campaign contributions and expenditures."

Thank you for your anticipated cooperation in this matter.

Very truly yours,

Dennis J. Duffin,
Director

DJD/rep